

REMARKS

Claims 21-22, 24-30, 32-33, 41-50, 64-67-76, and 79-97 are pending in the present patent application. Claims 21-22, 24-25, 27-30, 41-43, 49-50, 64, 68, 71-76, and 79 have been amended to clarify that which was previously claimed, correct scrivener's errors, and/or to maintain antecedent basis. Also, new Claims 80-97 have been added, and Claim 77 has been canceled. No new matter was added. Support for the amendments to the pending Claims and the new Claims can be found in the specification in at least paragraphs 12-13, 25, 32, 50-60, 62, 64-65, 76, 78, 88, and 92-93. Reconsideration of the pending Claims and allowance is respectfully requested in view of the amendments to the Claims and the following remarks.

Claim Objections

In the office action mailed January 12, 2007, Claims 21 and 41 were object to for including grammatical errors. Claims 21 and 41 have been amended to correct these errors.

The 35 U.S.C. §101 Claim Rejections

Claims 21, 41, and 64, and their respective dependent claims, were rejected as failing to comply with the statutory subject matter requirements of 35 U.S.C. §101 because the claims failed to include a "useful, concrete, and tangible" result. Applicant has amended each of Claims 21, 41, and 64 to describe an output message, which is a useful, concrete, and tangible result. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §101 rejections of Claims 21, 41, and 64, and their respective dependent Claims.

The 35 U.S.C. §112 Claim Rejections

Claims 21-22, 24-30, 32-33, 41-50, 64-77, and 79 were rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Independent Claims 21, 41, and 64 were amended to overcome each of the 35 U.S.C. §112, second paragraph rejections. Thus, Applicant

respectfully requests withdrawal of 35 U.S.C. §112, second paragraph rejections of Claims 21, 41, and 64 and the Claims dependent therefrom.

The 35 U.S.C. §103(a) Claim Rejections

Claims 21-22, 24-30, 32-33, 41-50, 64-77, and 79 were rejected pursuant to 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 7,028,312 to Merrick et al. (hereinafter "Merrick") and U.S. Patent Application Publication No. 2002/0124045 to Moore et al. (hereinafter "Moore"). Applicant respectfully traverses these rejections because the cited combinations of the art fail to teach, suggest, or disclose each and every limitation of the Claims, and thus a *prima facie* case of obviousness in view of the cited art cannot be maintained.

Claims 21-22, 24-30, 32-33, and 71-76

Neither Merrick nor Moore teach or suggest, either separately or together, the recited limitation in amended Claim 21 of during the translation with the ApiService class to the first document object model document, limiting with a Message class that is a wrapper of the document object model document a first data structure of the first document object model document to representation as an input message with a plurality of fields, wherein the first data structure is limited by a plurality of methods included in the Message class to represent a field data type that is pre-specified with the methods. On page 13 of the Office Action mailed January 16, 2007, it was indicated that Merrick describes the use of wrappers of the document object model document. However, Merrick merely describes a "codec" that is "responsible for converting a set of arguments into a message". (Merrick, Col 21, lines 26-31.) Specifically, the "codec generates an internal representation of the ... message from the arguments". (Id.) Merrick's codec does not teach or suggest limiting a data structure of a first document object model with a Message class that is a wrapper of the first document object model as described in Claim 21. To the contrary, Merrick fails to describe any limitation to the structure of the "internal representation" and instead simply indicates use of "DOM APIs to encapsulate this representation." (Id.) Further, Moore is completely silent in this regard.

Moreover, neither Merrick nor Moore teaches or suggests the recited limitation of while said data is being read in with the custom application code, limiting a second data structure of the second document object model document with the methods included in the Message class to representation as an output message with a plurality of fields, wherein the second data structure is limited with the methods to represent a field data type that is pre-specified with the methods as also described in Claim 21. Instead, Merrick merely describes a "codec" that "encodes the service's output arguments". (Merrick, Col 21, lines 61-63.) Specifically, Merrick describes that the codec uses the "DOM APIs" (Merrick, Col 21, lines 30-31.), but clearly fails to describe limiting a second data structure of a second document object model with the methods included in a Message class as described in Claim 21.

Claims 41-50, 76, and 79

Merrick and Moore do not teach or suggest, either alone or in combination, the recited limitation in amended Claim 41 of a Message class operable within the server computer as a wrapper of the document object model class to restrict a format of the document object model document. To the contrary, Merrick simply describes a parser and a DOM API to "generically encode" an XML document and "to build data structures identified by the label found in the document" with a codec. (Col. 21 lines 9-17) Clearly, Merrick does not teach or suggest a Message class operable within a server computer as a wrapper of a document object model class to restrict a format of a document object model document. In addition, Moore is silent with regard to restriction of a format of a document object model document.

Amended Claim 41 also describes a MESSAGEDEFINITION class operable in the server, wherein the MESSAGEDEFINITION class includes a listing of pre-specified fields each of which describe a corresponding pre-specified data type, and wherein the Message class is further operable, within the server during translation, to limit a format of fields included in the input message to a predetermined data structure based on the described corresponding pre-specified data type. Neither Merrick nor Moore describe a Message class that is operable within a server during

translation to limit a format of fields included in an input message to a predetermined data structure based on a described corresponding pre-specified data type.

Claims 64-70

Amended Claim 64 describes a server computer operable to execute instructions included in a Message class that is operable as a wrapper of the document object model document to restrict the conversion to the first document object model document based on a listing of data types that are pre-specified for the request parameters by a plurality of methods included in the Message class, wherein the data types limit a first data structure of a plurality of fields included in the first document object model document to a predetermined data structure specified by the data types. Neither Merrick nor Moore alone or in combination teach or suggest a Message class that is operable as a wrapper of the document object model document to restrict conversion as described in Claim 64. To the contrary, both Merrick and Moore are silent on any form of wrapper of a document object model to restrict conversion of the document object model document as described in Claim 64.

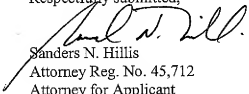
For at least the foregoing reasons, the present rejections of amended Claims 21, 41, and 64 and the respective claims dependent therefrom fail to fulfill the third basic criteria for obviousness that must be met, which is that all the limitations of the claims must be taught or suggested by the combination of the cited prior art. Accordingly, a *prima facie* case of obviousness cannot be maintained, and Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of Claims 21-22, 24-30, 32-33, 41-50, 64-76, and 79. Also, Applicant respectfully asserts that new claims 80-97 are patentable over the cited references for at least the foregoing reasons.

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In view of the amendments to the Claims and the above remarks, the application is now in condition for allowance, which is respectfully requested. Should the Examiner deem a telephone conference to be beneficial in expediting examination and/or allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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